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**UNITED STATES BANKRUPTCY COURT**

**CENTRAL DISTRICT OF CALIFORNIA**

**LOS ANGELES DIVISION**

In re:

Oceanwide Plaza LLC,

Debtor.

Case No.: 2:24-bk-11057-DS

Hon. Deborah J. Saltzman

Chapter 11

**CHAPTER 11 STATUS REPORT AND  
REQUEST TO CONTINUE STATUS  
CONFERENCE**

Date: May 6, 2025

Time: 1:00 p.m.

Place: Ctrm 1639 / Via ZoomGov

255 East Temple Street

Los Angeles, CA 90012

**TO THE HONORABLE DEBORAH SALTZMAN, UNITED STATES BANKRUPTCY  
JUDGE, AND ALL OTHER INTERESTED PARTIES:**

Debtor and Debtor-in-Possession Oceanwide Plaza LLC (“Debtor”) respectfully submits its *Status Report* in advance of the status conference scheduled for May 6, 2025 at 1:00 p.m. (the “Status Conference”) and, in connection therewith, seeks a continuance of the Status Conference to June 2025.

**I. BACKGROUND**

1. On March 6, 2025, Debtor filed a Stipulation [ECF No. 613] with the Office of the United States Trustee (the “US Trustee”) regarding the progress of this case (generally, the “US Trustee Stipulation”). By the US Trustee Stipulation, the parties agreed that a status conference was appropriate to discuss with the Court the following issues:

- a. The sale of Debtor’s real property, including a timeline of when Debtor intends to set an offer deadline and a date to close the sale of such property;
- b. The hearing date to consider confirmation of Debtor’s plan of reorganization;
- c. Resetting dates vacated in a prior scheduling stipulation;
- d. The status of insurance on Debtor’s real property; and
- e. Any other information the Court or Debtor deems appropriate.

2. On March 6, 2025, the Court entered an *Order* [ECF No. 615] approving the US Trustee Stipulation and directed that a status conference be held on April 14, 2025 at 1:00 p.m. The Court also required that Debtor file a status report addressing the topics referred to in the US Trustee Stipulation by April 7, 2025.

3. Debtor filed status reports on March 31 and April 7, 2025 [ECF Nos. 635 and 641]. Debtor’s April 7 status report included a request to continue the status conference for three weeks to either May 6 or 8, 2025. The US Trustee did not oppose a one-time continuance, and Debtor reserved the right to seek further continuances if necessary. *See* ECF No. 641.

4. On April 9, 2025, the Court entered an *Order and Notice of Rescheduled Status Conference* which rescheduled the Status Conference for May 6, 2025 at 1:00 p.m. (Pacific).

**II. UPDATES SINCE THE LAST STATUS REPORT**

5. Debtor provides the following update on the progress made in this case since the April 7 status report. This update is prepared in consultation with Lendlease and LADI:

- a. Debtor continues to confer with multiple parties interested in acquiring the Property and meaningful progress has been made in recent weeks.

1 b. Debtor and major creditors are continuing discussions designed to resolve  
2 issues pending among these parties. Here too progress has been made recently.

3 c. At the request of some of the Consulting Parties, a continued mediation  
4 session before the Hon Randall Newsome was held on April 15, 2025.

5 d. Given the on-going discussions and negotiations, Debtor, Lendlease and  
6 LADI believe it appropriate for the Status Conference to be continued to a date in June 2025.

7 **III. REQUEST FOR CONTINUANCE TO JUNE 2025:**

8 Debtor respectfully requests that the Court continue the Status Conference set for May 6,  
9 2025, to a date convenient for the Court in June 2025. Debtor will file a status report one week before  
10 the continued status conference with updated information.

11  
12 Dated: April 29, 2025

BRYAN CAVE LEIGHTON PAISNER LLP

13 By: /s/ Sharon Z. Weiss

14 Sharon Z. Weiss

15 Attorneys for Debtor and Debtor-in-Possession  
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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 120 Broadway, Suite 300, Santa Monica, California 90401-2386.

A true and correct copy of the foregoing document(s) entitled: **CHAPTER 11 STATUS REPORT AND REQUEST TO CONTINUE STATUS CONFERENCE** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On *(date)* April 29, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **PLEASE SEE ATTACHED LIST**

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On *(date)*, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page


**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on *(date)*, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

April 29, 2025  
Date

Raul Morales  
Printed Name

  
Signature

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

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